

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
REBECCA LEVY
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Rebecca_Levy@fd.org
6

7 Attorney for Kejon Ward

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 KEJON WARD,

14 Defendant.

Case No. 2:17-cr-00221-JAD-GWF-2

UNOPPOSED EMERGENCY
MOTION TO MODIFY
CONDITIONS OF RELEASE
ALLOWING MR. WARD TO
TRAVEL TO CALIFORNIA

15
16 The Defendant, Kejon Ward, through his attorney, Rene L. Valladares, Federal Public
17 Defender, and Rebecca Levy, Assistant Federal Public Defender, respectfully moves this
18 Honorable Court to respectfully to modify condition of his release to allow Mr. Ward to travel
19 to California to attend his father's funeral. Mr. Ward's release allows him to travel to California
20 without modifying his release, but he needs permission from this Court to stay somewhere aside
21 from his current residence. The government and pretrial do not object.

22 DATED: February 3, 2022

23 RENE L. VALLADARES
Federal Public Defender

24
25 By: /s/ Rebecca Levy

26 REBECCA LEVY
Assistant Federal Public Defender
Attorney for Kejon Ward

ARGUMENT

On July 20, 2017, Mr. Ward made his initial appearance for violations of 18 U.S.C. § 924(c)(1)(A)(ii), 18 U.S.C. § 1951(a), and 18 U.S.C. § 922(g). ECF No. 21. At the initial appearance on July 20, 2017, Mr. Ward submitted to detention, but reserved the right to re-open the hearing once the state hold lifted. ECF No. 39. During the initial appearance, Mr. Ward was being held on a state hold. On September 7, 2017, Mr. Ward's state hold was discharged. On November 2, 2017, Mr. Ward was released with several conditions including home confinement with GPS monitoring. ECF No. 69. On November 8, 2017, the government's request to revoke Mr. Ward's release was denied. ECF No. 73. On November 11, 2018, the Court modified Mr. Ward's release conditions allowing him to spend time with his son on Sundays. ECF No. 141. On August 26, 2021, Mr. Ward plead guilty pursuant to a plea agreement and accepted responsibility. ECF No. 284. Sentencing is currently scheduled for February 15, 2022. ECF No. 303.

Mr. Ward is working full-time, but found even better steady employment with Show Group Production Services. Sadly, Mr. Ward's father had terminal cancer that spread and ultimately caused his death on Wednesday, February 2, 2022. Mr. Ward would like to go to California to assist with funeral arrangements, attend the funeral and assist his family with all matters related to his father's death. Mr. Ward will go to California with his sister who will drive them in their mother's car. Mr. Ward will continue with other conditions of his current supervision. Mr. Ward is requesting he be allowed to leave once the Court Orders the modification for approximately one week.

Pretrial does not object to this request. The government does not object.

CONCLUSION

Accordingly, we are respectfully requesting this Court modify the conditions of Mr. Ward's release to allow him to travel to California to attend his father's funeral.

DATED: February 3, 2022.

Respectfully submitted,
RENE L. VALLADARES
Federal Public Defender

By: /s/ Rebecca Levy

REBECCA LEVY
Assistant Federal Public Defender
Attorney for Kejon Ward

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: February 3, 2022